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March 7, 2022

**VIA ECF**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

RE: *Metropolitan Transportation Authority Defined Benefit Pension Plan Master Trust, et al.*  
*v. Allianz Global Investors U.S. LLC, et al.*, No. 1:20 Civ. 7842 (KPF)

Dear Judge Failla:

Pursuant to Rule 9 of Your Honor's Individual Practices and Section IX of the Stipulated Second Amended Protective Order entered by the Court on November 5, 2021 ("Protective Order") (ECF No. 110), Plaintiffs Metropolitan Transportation Authority Defined Benefit Pension Plan Master Trust, Manhattan and Bronx Surface Transit Operating Authority Pension Plan and Metropolitan Transportation Authority Other Postemployment Benefit Plan (together, "Plaintiffs") request permission to redact references to certain documents in Plaintiffs' Second Amended Complaint ("Plaintiffs' SAC"). The redacted portions of Plaintiffs' SAC have been designated as "Confidential" under the Protective Order. In accordance with Rule 9(B) of Your Honor's Individual Practices, we have publicly filed the Plaintiffs' SAC with the proposed redactions and filed under a seal a copy of the unredacted Plaintiffs' SAC with the proposed redactions highlighted.

Plaintiffs do not concede that the materials designated as "Confidential" by Defendant Allianz Global Investors U.S. LLC are confidential.

Very truly yours,

/s/ Javier Bleichmar

Javier Bleichmar  
Bleichmar, Fonti & Auld LLP

/s/ Regina M. Calcaterra<sup>1</sup>

Regina M. Calcaterra  
Calcaterra Pollack LLP

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<sup>1</sup> Counsel's electronic signature ("/s/") is signed with consent pursuant to Rule 8.5 of this Court's Electronic Case Filing Rules & Instructions as of February 1, 2021.

Application GRANTED. Plaintiff shall be permitted to file a redacted version of the Second Amended Complaint on the public docket, with the unredacted version viewable only to the parties and the Court.

The Clerk of Court is directed to terminate the pending motion at docket entry 80.

Dated: March 8, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE